

Pierce McCoy, PLLC
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.**

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

**VERIFIED STATEMENT OF PIERCE MCCOY, PLLC PURSUANT TO
RULE 2019 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

TO THE HONORABLE ROBERT D. DRAIN,
UNITED STATES BANKRUPTCY JUDGE:

Pierce McCoy, PLLC ("Pierce McCoy"), counsel to Dell Marketing, L.P., Dell Financial Services L.L.C., ePossibilities USA Ltd., The Marion Plaza, Inc., Governor's Square Company, Huntington Mall Company, Meadowbrook Mall Company, Ohio Valley Mall Company, The Cafaro Northwest Partnership, Spotsylvania Mall Company, Howland Commons, LLC, and Washington Real Estate Investment Trust (together, the "Represented Parties"), files this Verified Statement pursuant to Rule 2019(a) of the Federal Rules of Bankruptcy Procedure.

1. The names and addresses of the parties represented by Pierce McCoy in the above referenced chapter 11 cases are:

- Dell Marketing, L.P. - One Dell Way, Round Rock, Texas 78682
- Dell Financial Services L.L.C. – One Dell Way, Round Rock, Texas 78682
- ePossibilities USA Ltd. – Edge by Ascential, The Blade, Abbey Square, Reading, RG1 3BE
- The Marion Plaza, Inc. – 5320 Youngston Road, Unit #120, Niles, Ohio 44446

- Governor's Square Company – 2801 Wilma Rudolph Blvd, Unit #100, Clarksville, TN 37040
- Huntington Mall Company – 100 Huntington Mall Rd, Unit 100, Barboursville, WV 25504
- Meadowbrook Mall Company – 2399 Meadowbrook Road, Unit #301, Bridgeport, WV 26330
- Ohio Valley Mall Company – 67800 Mall Road, Unit 100, Clairesville, OH 43950
- The Cafaro Northwest Partnership – 3500 S. Meridian Rd, Unit #900, Puyallup, WA 98373
- Spotsylvania Mall Company – 100 Spotsylvania Mall Rd., Unit 100, Fredericksburg, VA 22407
- Howland Commons, LLC – 2100 Niles Cortland Road, SE, Warren, OH 44484
- Washington Real Estate Investment Trust – 1775 Eye Street NW, Suite 1000, Washington, DC 20006

2. The Marion Plaza, Inc., Governor's Square Company, Huntington Mall Company, Meadowbrook Mall Company, Ohio Valley Mall Company, The Cafaro Northwest Partnership, Spotsylvania Mall Company, Howland Commons, LLC and Washington Real Estate Investment Trust were all landlords for one or more of the Debtors on the petition date. These landlords hold claims against one or more of the Debtors in an unknown amount, including, but not limited to, all amounts due and owing under the lease between the parties plus any rejection damages and/or administrative priority claims for unpaid post-petition rent and other charges.

3. Dell Financial Services L.L.C., and ePossibilities USA Ltd. maintain executory contract with multiple Debtor entities. These creditors hold claims against the Debtors in an unknown amount, including, but not limited to, all amounts due and owing under the executory contracts plus any rejection damages and/or administrative priority claims for unpaid obligations.

4. Dell Marketing, LP maintains general unsecured claim of approximately \$108,736.34 against Sears Holding Corporation, and \$84,903.32 against Sears Roebuck, and a reclamation claim of approximately \$1,955.26 against Sears Home Improvement Products.

5. The Represented Parties have each requested that Pierce McCoy represent them and their interests in connection with these chapter 11 cases.

6. Upon information and belief, as of the date hereof, Pierce McCoy does not hold any claim against or equity interest in the Debtors.

7. The undersigned certifies that this Verified Statement is true and accurate to the best of his knowledge and belief. Pierce McCoy reserves the right to revise and supplement this Verified Statement.

Dated: January 28, 2019

Respectfully submitted,

By: /s/ Jonathan A. Grasso

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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of January 2019, a copy of the foregoing Statement was served electronically via the CM/ECF system upon those parties registered to receive such service in these cases.

/s/ Jonathan A. Grasso
Jonathan A. Grasso